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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THC SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington. D.C. 20554

Re.   *Joint Application by BellSouth Corporation, BellSouth
Telecommunications, Inc., and BellSouth Long Distance, Inc. for
Provision of In-Region, InterLATA Services in Florida and Tennessee,
WC Docket No. 02-307*

Dear Ms. Dortch:

The Commission Staff has requested AT&T's views on the recent decision of
BellSouth to delay implementation of its Release 11.0, scheduled to go into production on
December 8, 2002, and on recurring problems with service outages as a result of BellSouth's
continued use of two separate orders for UNE-P conversions notwithstanding rulings by the
Georgia and Louisiana Commissions to implement a single "C" order for UNE-P conversions.
These continuing problems demonstrate that BellSouth still fails to devote sufficient resources to
the change control process and fails to live up to its commitments to implement regulatory orders
or meet regulatory "expectations" about its conduct upon which prior state Section 271
recommendations were based and upon which this Commission approved BellSouth's Section
271 applications.

The Delay of Release 11.0

BellSouth portrays its decision to postpone implementation of Release 11 0' –
after it "discovered a high number of defects in the software package" that it received from its

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[1] BellSouth has discussed its decision in a rnccting with Commission Staff on October 31, 2002, in two *ex
parte* letters filed with the Commission on November 1 and November 7, 2002, and in its Reply
Comments filed on November 1, 2002 See *ex parte* letter from Kathleen B. Levitz (BellSouth) to
Marlcnc H Dortch, dated November 1, 2002 ("November I *ex parte*"); lcttcr from Kathleen B. Levitz to
Marlene H. Dortch. dated November 7. 2002 ("November 7 *ex parte*"); Rcply In Support of Application
By BellSouth For Provision of In-Region. InterLATA Services in Florida and Tennessee, filed
November 1. 2002 ("BellSouth Rcply") at 4. 14-15 & Reply Affidavit of William N. Stacy ("Stacy Reply

vendor, Telcordia – as "a testament to the efficacy of BellSouth's pre-release testing." BellSouth Reply at 4, I5 AT&T certainly agrees that BellSouth should delay implementation of a release that is riddled with defects, because "software releases with numerous defects inhibit smooth transition between releases " *Georgia/Louisiana 271 Order*¶ 195. That, however, has *not* been BellSouth's practice in the past. As AT&T and other CLECs have repeatedly pointed out, BellSouth has consistently implemented releases containing serious flaws – reflecting a clear failure of BellSouth to conduct adequate internal testing prior to such implementation. *See, e.g.,* AT&T at 12-13 & Bradbury Dec. ¶¶ 45-46.

BellSouth's prior history of implementing defect-ridden releases, by itself, casts substantial doubt on its claim that it will be able to implement Release 11.0, without defects, on the new dates it has scheduled under the two "options" that it presented to the CLECs.[2] BellSouth's previous representations to this Commission offer even more reason for skepticism. Only three months ago, BellSouth advised the Commission that it had delayed implementation of its Releases 10.6 and 11.0 "in order to provide BellSouth with additional time to perform internal testing."[3] Notwithstanding that "additional time" for internal testing, however, Release 10.6 contained numerous releases when implemented – and implementation of Release 11.0 has now been delayed a second time, due to "numerous defects."

Aff "), ¶¶ 103-1I8

[2] BellSouth proposed two "options" to the CLECs Under "Option I," BellSouth would implement Release 11.0 on December 29, 2002 (three weeks later than previously scheduled) – **but** one change request included in Release 11.0, which involves UNE-to-UNE bulk migrations, would not be implemented until March 30, 2003. Under "Option 2," BellSouth would implement all of Release 11.0 (including the UNE-to-UNE bulk migration functionality) on January 19, 2003. BellSouth Reply at 4, 15, Stacy Reply Aff ¶ 108. On November 4, 2002, the CLECs voted in favor of "Option 1," for three reasons First, the CLECs wished to have as many change requests in that release implemented as soon as possible (particularly in view of BellSouth's historically glacial pace of implementing change requests desired by CLECs). Second, the release would correct numerous defects in BellSouth's OSS, many of which had gone uncorrected for lengthy periods of time Third, the CLECs doubted that BellSouth could properly implement all of Release 11.0, including the change request involving bulk UNE-to-UNE migrations. simply by delaying implementation from December 8 to January 19 (as proposed by "Option 2") The premise of "Option 2" that BellSouth would simply take an additional 3 weeks to implement the **bulk** UNE-to-UNE migration functionality was inconsistent with the suggestion of "Option 1" that BellSouth would require 15 weeks to implement the same functionality after the remainder of Release 11 0 was implemented.

[3] *See* Reply Affidavit of William N. Stacy filed August 5, 2002. in WC Docket No. 02-150 *(Five-Store Proceeding)*, ¶ 46

In view of these facts, there is no basis for believing that BellSouth will implement Release 11 0 on its newly-scheduled dates or that the release will not be plagued with defects when implemented.[4] To the contrary, BellSouth's recent statements to the CLECs suggest that its pattern of implementing releases containing numerous defects will continue with Release 11 0. In voting for BellSouth's "Option 1," the CLECs emphasized that they were conditioning their vote on a complete explanation by BellSouth of the efforts that it was making "to ensure that these problems do not continue on an ongoing basis, a firm commitment to fix defects found in this release, and an explanation of what actually caused these problems (resources, programmer problems, poor specifications, etc.)." BellSouth, however, promised only to provide the CLECs with a *preliminary* assessment of the problems that led to the delay of Release 11.0 by November 13, and with a root-cause analysis "after Release 11 0 is in production and the software development teams have had a chance to perform their comprehensive assessment"[5] BellSouth's response makes clear that it has not yet been able to determine the root causes of the defects in Release 11.0. and will not be able to do so until *after* the release has been implemented.

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[4] The Status Report on Release 11.0 that BellSouth provided CLECs on November 12, 2002, raises further questions regarding BellSouth's ability to implement that release on the dates promised under its two options BellSouth decided to postpone its implementation of the release by at least three weeks because 135 defects were still identified when BellSouth's internal testing was approximately 60 percent complete. Stacy Reply Aff. ¶ 106. According to the November 12 Status Report, as of November 11 BellSouth still identified at least 72 defects (all of which were Severity 2 defects), with 81.40 percent of the internal testing complete. The 72 defects reported by BellSouth, however, almost certainly understate the true number of defects that still exist, because BellSouth's report does not discuss the UNE-to-UNE migration functionality that was also part of Release 11.0 (and which, under BellSouth's "Option 1," **will** be implemented three months after the remainder of Release 11.0). A copy of BellSouth's report is attached hereto as Attachment 1. In its November 4" meeting with the CLECs on Release 11.0, BellSouth acknowledged that the UNE-to-UNE migration functionality is one of the "two Release 11.0 features with the most defects." Minutes of November 4, 2002 Release 11.0 Status Meeting ("November 4th Minutes") at 2 (attached hereto as Attachment 2). BellSouth's failure to provide any details concerning this functionality (apparently under the theory that under "Option 1," the functionality is no longer part of Release 11 0 but now a part of a separate release (Release 12.0)) is simply further evidence of its failure to meet its promise, and the Commission's expectation, that it would work collaboratively with the CLECs and provide them with adequate information regarding the status of the releases. Finally, BellSouth's status Report does not include the staggering number of defects in its documentation for Release 11 0 On November 8, 2002, BellSouth issued revisions to its Business Rules for Local Ordering, listing *more than 900* documentation defects.

[5] *Ex parte* letter from Kathleen B. Smith (BellSouth) to Marlene H. Dortch, dated November 7, 2002 (attachment entitled "BellSouth Response to CLEC Request Submitted on November 4, 2002").

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BellSouth's approach is totally unacceptable. In essence, BellSouth has proceeded to set new dates for the implementation of the release even before it has determined the causes of the problems in the release, and proposes to make such a determination only after the fact (of implementation). This approach all but ensures that, when implemented, Release 11.0 will be no less plagued with defects than BellSouth's previous releases.

BellSouth has suggested that Release 11.0 contains a high number of defects because it is "considerably more complex than any previous release this year," emphasizing that Release 11 0 contains approximately twice the number of lines of code (850,000) as Release 10.5 and Release 10.6(400,000 and 450,000 lines, respectively) *See, e.g.,* Stacy Reply **Aff.** ¶¶ 104-105. BellSouth, however, provides no data or other evidence to support this suggestion. In fact, prior to announcing its decision to postpone implementation of Release 11.0, BellSouth had never raised the size or complexity of Release 11.0 as a source of concern. Moreover, BellSouth has never provided any evidence, whether in or outside of this proceeding, that Release 11.0 is materially more complex than Releases 10.5and 10.6. Even assuming that BellSouth's assertion regarding the complexity of Release 11.0 is true, it demonstrates once again that BellSouth is not providing CLECs with the information that they need to be informed participants in the CCP.

The capacity information that BellSouth has provided to CLECs indicates that, contrary to BellSouth's claim, Release 11.0 is not materially more complex than previous releases.[6] Based on AT&T's calculations, the number of units used for Types 2, 4, and 5 change requests will be 335 units for Release 11.0– which is only slightly higher than the 303.6 actual units used in Release 10 5. Although the difference between the estimated units for Release 11.0 (335 units) and Release 10.6(224 units) is greater, even that difference does not explain why the number of lines of code is twice as great for Release 11.0. In short, BellSouth's attempt to attribute the high number of defects in Release 11.0 to its "complexity" does not withstand scrutiny.

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[6] **As** AT&T has previously pointed out, BellSouth has not made available to CLECs historical size and capacity information for all change requests and releases implemented in 2002, or on all change requests planned with the potential to be implemented in 2002. Bradbury/Norris Dec. in *Five-Slate 271 Proceeding,* ¶ 26. The analysis of Releases 10 5, 10.6,and 11.0 described herein is based upon estimates calculated from more generalized information that BellSouth has provided to CLECs in its "Monitoring and Reporting Post-Release Capacity Utilization"for the second quarter of 2002, and its "Flag Ship CCP Release Implementation Schedule" The "Monitoring and Post-Release Capacity Utilization" report for the second quarter of 2002 encompasses only Release 10 5. Thus, the total usage figures described herein are actual figures for Release 10.5, but the usage figures for Releases 10.6and 11.0 are estimates based upon the averages found for Release 10 5 and the current "Flag Ship CCP Release Implementation Schedule."

Even more fundamentally, however, BellSouth's postponement of Release 11.0 simply provides further confirmation of three fundamental deficiencies in the CCP *First,* the circumstances surrounding the postponement show that, BellSouth's repeated claims to the contrary notwithstanding, BellSouth has not "collaborated" with the CLECs in the CCP.[7] BellSouth did not even suggest to the CLECs that the scheduled December 8th implementation date for Release 11.0was in jeopardy until the afternoon of October 31 – when BellSouth cryptically advised CLECs by e-mail that it wished to hold a conference call with them on November 4 "to discuss the status" of the release.* By contrast, in a meeting with Commission Staff at almost the same time on October 31, BellSouth expressly advised Staff of its decision to postpone the implementation date and provided Staff with a detailed description of the reasons for its decision, the two "options" that it would propose to the CLECs, and the interim manual "workaround" that it was willing to implement for bulk orders for UNE-to-UNE migrations.'

BellSouth did not specifically notify the CLECs of problems with the December 8th implementation date until late morning on November 1, when it sent an e-mail to the CLECs enclosing materials describing its two proposed "options" and its proposed interim manual "workaround" for UNE-to-UNE migrations.[10] It was undoubtedly no coincidence that, about the same time, BellSouth was filing its Reply Comments in this proceeding with the Commission. And, unlike the materials that it sent to the CLECs, BellSouth's Reply Comments provided a full description of the number of defects that it had found in Release 11.0.[11]

The point here is not that BellSouth should have notified the CLECs on October 31 (or November 1) of its intention to delay Release 11.0before it advised the Commission The point is that BellSouth knew, *weeks prior to that time,* that the implementation of Release 11 0 was in serious jeopardy, but failed to advise the CLECs despite its promise to "collaborate" within the CCP.

On October 4 – almost a month before it advised CLECs of the postponement of Release 11.0– BellSouth became aware that, based on Telcordia's internal testing, Release 11.0

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[7] *See, e.g.,* BellSouth Reply at 10 & Stacy Reply Aff. ¶¶ 22, 27-28, 30, 32

[8] *See* electronic mail message from BellSouth Change Control to CLECs, dated October 31, 2002 (attached hereto as Attachment **3**).

[9] *See* November 1 **ex** *parte* (attachments entitled "Release 11.0status," and "Optional Interim Manual UNE-P to UNE-L Process").

[10] *See* electronic mail message from BellSouth Change Control to CLECs, dated November 1, 2002 (attached hereto as Attachment 4).

[11] *Compare id. with* Stacy Reply Aff ¶¶ 105-106.

contained 629 pre-release defects. This number was more than *ten rimes* the number of pre-release defects found in its two earlier releases (10.5 and 10.6).[12] Moreover, although BellSouth was supposed to receive the Generally Available ("GA") code for Release 11.0 on October 4 from Telcordia, Telcordia did not provide the code on that date, or even on October 6, when Telcordia sent a second shipment of preliminary code   When Telcordia sent a third shipment of preliminary code for the release on October 18, "Known defects existed."[13]

Despite these clear warning signs, BellSouth waited nearly four weeks before advising the CLECs that implementation of the release might be delayed. Instead, BellSouth unilaterally decided to postpone the implementation and developed – without consultation with the CLECs – its two "options" (with specific alternative implementation dates). Only after it had done so did BellSouth belatedly notify the CLECs that a problem existed, and gave them only two "options" from which to choose, with only one business day's notice. This is clearly not the "collaboration" that the Commission expected (and required) from BellSouth in its decisions approving BellSouth's prior applications. *See Five-State Order* ¶ 179; *Georgia/Louisiana Order* ¶¶ 193-194.

Second, BellSouth's postponement of Release 11.0 is but the latest example of its continuing failure to meet its commitment (and the Commission's expectation) that it would implement change requests in a timely manner. BellSouth's conduct exhibits a pattern of postponing implementation of releases containing change requests that the CLECs have requested. With the exception of its first release in 2002, BellSouth has postponed or cancelled the implementation of each of the releases that it scheduled for 2002 – including Release 11.0, which it now has postponed *twice.*

Although BellSouth originally scheduled implementation of the industry standard LSOG5/ELM5 release for May 2002, it unilaterally decided in November 2001 to cancel that release altogether, and to "skip" instead to the next industry standard release in 2003. Bradbury Reply Dec. ¶ 18. Shortly before issuance of the *Georgia/Louisiana Order,* BellSouth postponed implementation of Release 10.5 from the originally scheduled dates of May 18-19 to June 1-2 – and, as implemented, the release still contained numerous defects.[14]

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12 **Stacy** Reply Aff. ¶ 105, November 1 *ex parte* (attachment)

13 November 1 *ex parte* (attachment entitled "Release 11.0 status" and showing "Schedule").

14 BellSouth did not advise this Commission, or the CLECs, of the postponement of the implementation of Release 10.5 until the day before the issuance of the Commission's *Georgia/Louisiana Order See ex parte* letter from Kathleen B Levitz (BellSouth) to Marlene H Dortch in CC Docket No 02-35, dated May 15, 2002

Following issuance of the *Georgia Louisiana* **Order,** BellSouth announced the postponement of the two additional releases scheduled for implementation later in 2002 Implementation of Release 10 **6,** originally scheduled for July 13-14, was postponed until August 25-26, when it was finally implemented – again, with numerous defects [15] BellSouth also postponed the implementation of Release 11 0. originally scheduled for November 16-17, until December 8. Now, of course. BellSouth has postponed the implementation of Release 11.0 for a second time, until late December and (for UNE-to-UNE bulk migrations) until late March 2003 under "Option 1" and until mid-January 2003 under "Option 2."

The postponement of Release 11.0 simply causes further delay in the implementation of change requests that are important to CLECs. According to BellSouth's November 1 *ex parte* and OSS reply affidavit, Release 11.0 contains not only one Type 2 (regulatory) change request, but also five change requests implementing new flow-through functionality, two Type 4 (BellSouth-initiated) change requests and three Type 5 (CLEC-initiated) change requests. *E.g.,* Stacy Reply Aff. ¶ 116. Many of those change requests were submitted long ago – and are long overdue. For example, AT&T requested mechanized functionality for bulk ordering of UNE-to-UNE migrations in Change Request 0215, submitted on November 8, 2000 This functionality would enable a CLEC to submit a single spreadsheet/order to BellSouth electronically when it wished to provide customers currently served through the UNE platform with the same service using UNE loops with local number portability ("LNP") instead. This process would be substantially less costly and time-consuming than BellSouth's current procedures, which require CLECs to send a separate order for each such "UNE-to-UNE" customer. The additional delay in the implementation of the new process will impose yet more costs on CLECs.[16]

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[15] BellSouth's claim that "there were only eight defects in Release 10.6 that affected the CLECs" is utterly baseless, as demonstrated by BellSouth's total failure to describe the criteria that it used to determine ahether a particular defect was CLEC-affecting. *See* Stacy Reply Dec. ¶ 82. As AT&T has already shown. 22 defect change requests were filed between August 26, 2002, and September 30, 2002. Bradbury Reply Dec. ¶ 22. **All** 22 of these were defects in Release 10.6, because each new BellSouth release contains all of the functions and capabilities of the prior releases and totally replaces that release. Any defects occurring after an implementation are present (and correctable) only in the new release.

[16] BellSouth has offered no satisfacton explanation for its delay in the implementation of a mechanized functionality for bulk UNE-to-UNE migrations. In fact, BellSouth cannot do so, since BellSouth already provides such a process for the bulk conversion of customers from resale to the UNE platform; AT&T's Change Request 0215 simply seeks implementation of the same process for conversion from UNE-P to UNE loops with LNP. Although BellSouth has now promised to provide an interim manual process for such migrations with the use of a single spreadsheet (Stacy Reply Aff. ¶¶ 112-114), there is no reason why BellSouth could not have implemented such a manual process long ago. Even now, it is unclear when the manual process will be fully available to CLECs Although BellSouth stated in its Reply

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      The delay in the implementation of Release 11 0 also postpones corrections to a number of defects in BellSouth's OSS. BellSouth's November 1 *exparre* letter and Reply Comments state that Release 11.0 includes 18 defect corrections (Type 6 change requests). *E.g.*, Stacy Reply Aff ¶ 116. BellSouth acknowledges that at least 6 of these defect corrections, which involve Severity 3 and Severity 4 defects, are *already* late under the defect correction intervals established by the Florida and Georgia PSCs. *Id.* ¶ 101.[17]

      The delay of the implementation of these defect corrections impairs the CLECs' ability to compete effectively with BellSouth. The accumulation of such a large number of defects without timely correction always makes it more difticult for CLECs to provide service to their customers with the same quality, timeliness, and quality as that provided by BellSouth to its own retail customers. For example, six of the defects make the DSL ordering process less efficient and more prone to error   At least three of the defects have caused CLECs submitting certain types of LSRs to receive rejection notices that are erroneous – orto receive no rejection notice at all – after BellSouth's OSS rejects the LSRs.[18]   At least two other defects impact the processing of supplemental orders [19]

Comments that it would implcmcnt the manual process "upon CLEC rcquest" *(id.*¶ 112), it advised CLECs last wcek that the process would be available only on December 9 – and only as a "trial offering" available exclusively to those CLECs that cxpress interest in participating in the trial. (One CLEC has already cxprcssed such interest) The manual process will not **be** made available to all CLECs until and unless the trial is successfully complctcd   Because BellSouth has established a 45-day trial period, the manual proccss will therefore not bc generally available until at least January 24, 2002, even under the most optimistic scenario   A copy of BellSouth's Carrier Notification Lettcr of November 8, 2002 announcing the manual proccss is attached hereto as Attachment 5. Regardless of when it becomes available, the manual process will not be a suitable substitute for thc requested fully automated proccss. The manual workaround, like any other manual process, carrics an enhanced risk of crrors or delays in provisioning   Evcn BcllSouth acknowledges that "thc interim spreadsheet solution may take somewhat longer to issuc the orders" to the LNP Gatcway, and claims only that thc longer ordering time will "not nccessarily" result in longer ordcr completion intervals. Stacy Rcply Aff. ¶ 114.

[17] Another defect correction that BellSouth acknowledges to bc latc is not scheduled for correction until January 19, 2003. Stacy Reply Aff. ¶ 101

[18] For cxample, ccrtain EDI mapping crrors are causing BellSouth's OSS to send no rejection notices to CLECs submitting LSRs via the EDI intcrface (as opposcd to thc TAG interfacc). Defccts in the OSS are also rcsulting in the generation of crroncous rejcction notices when a CLEC attempts to makc changes to an account that it already owns, but not when the CLEC submits a migration order,

[19] One defect permits supplemental ordcrs that (undcr BellSouth's business rulcs) either should bc rejcctcd or should fall out for manual proccssing to flow through, only to fail later in the provisioning

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These delays in the implementation of change requests will not end unless BellSouth vastly increases the resources that it devotes to such implementation. BellSouth now claims in its Reply Comments that it is devoting "approximately SO% of production capacity" for 2003 to implementing CLEC changes, thereby eliminating the DOJ's concerns about the sufficiency of the resources that it devotes to such changes BellSouth Reply at 3, 9, Stacy Reply Aff. ¶ 11. BellSouth, however, provides absolutely no basis to support this figure In fact, BellSouth's own Reply Comments contradict its claim.

Specifically, BellSouth states that 2,900.9 units of "starting capacity" are available for 2003 [20] It appears, however, that. (1) 1567.3 of these units will be dedicated to the implementation of the industry standard ELMS6 release (Release 14.0) in 2003; (2) 347.5 additional units will be dedicated to maintenance releases; and (3) 100 additional units will be dedicated to the industry standard NANC 3.2 release.[21] Thus, at most, 886.1 units (2900 9 − (1567.3 − 347.5 − 100)) would be available for implementation of feature change requests. According to its own Exhibit WNS-33, however, BellSouth would devote only 423.93 units − or 48 percent − of these 886.1 units to implementation of CLEC-initiated change requests. That percentage is below even the 50 percent share that BellSouth had promised to the CLECs, and well below the 80 percent that BellSouth claims. Furthermore, even if all of the feature change requests prioritized by CLECs (whether CLEC-initiated or BellSouth-initiated) are taken into account, only 567 18 units − or 64 percent of the remaining available capacity− would be dedicated to the implementation of feature requests.[22] In addition to falling well short of 80 percent, this 64 percent figure is considerably overstated, because it includes four BellSouth-initiated change requests which BellSouth, in violation of its "50/50 Plan" and the prioritizations made by the CLECs, unilaterally included in a CLEC production release. *See* Bradbury Reply Dec. ¶ 16. When those four change requests are excluded, the percentage is only 48 percent.

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process A scparate defect incorrectly assigns due dates to supplemental orders.

[20] Stacy Reply **Aff.** ¶ **64** In all of the previous estimates provided to CLECs, BellSouth estimated that the starting capacity for 2003 was 3,000 units   BellSouth has provided no explanation for the 100-unit discrepancy

[21] Stacy Reply Aff. ¶ 64. *See also* *id.* ¶ 58 (stating that Release 14.0 is "the industry release implementing ELMS6")

[22] **ATW'** performed these calculations using the data in Exhibit WNS-33 to Mr Stacy's Reply Affidavit, in the portion of the exhibit entitled "Encore Suite CCP Prioritization for Release 12 and Release 13" – which Mr. Stacy cites in his testimony. *See* Stacy Reply Aff. ¶¶ **62, 65** & Exh. WNS-33 at 1-2 AT&T used the latest figures included in the columns of the exhibit associated with each release in which the change is scheduled to bc implemented

BellSouth states that it "expected better performance from its vendor," suggesting that it bears no responsibility for the delay in the implementation of Release 11.0 BellSouth Reply at 15   BellSouth's attempts to blame the delay on Telcordia is specious   It was BellSouth's decision to outsource the programming work for Release 11.0 to Telcordia. Moreover, BellSouth's current profession of disappointment with Telcordia is belied by its previous statements (in this proceeding) describing Telcordia as part of its "high quality" software development "team" -- and boasting that Telcordia has the highest possible level of certification in the Capability Maturity Model. Stacy Opening Aff. ¶ 252 & n.54   Equally important, the history of BellSouth's implementation of change requests demonstrates that the flaws in Release 11 0 are not a unique occurrence caused by poor work by one of BellSouth's vendors (as BellSouth would have the Commission believe), but rather the product of BellSouth's longstanding failure to devote sufficient resources to the implementation of change requests and to conduct adequate internal testing [23]

Third, in postponing the implementation of Release 11.0, BellSouth once again demonstrates that it has not met the Commission's requirement that it provide CLECs with sufficient capacity information to enable them to make informed decisions regarding proposed systems changes, and the prioritization of those changes   **See** *Georgia/Louisiana 271 Order* ¶ 193 BellSouth's November 1 *ex parte* and Reply Comments set forth information that BellSouth has failed to provide to CLECs, and that BellSouth previously insisted that it was unable to provide. For example, BellSouth asserts that its process for assigning CLEC-prioritized change requests in Releases 12.0 and 13.0 included the assumptions that: (1) "Approximately 12% of the capacity will be reserved for maintenance releases"; and (2) "Approximately 10% of the remaining capacity in each release cycle capacity will be reserved for scope changes in prioritized features, and for expedited features and/or mandates."[24]

Obviously, knowing that BellSouth makes these assumptions in its process would be useful to CLECs in determining the available capacity in forthcoming releases, and the priorities that they will assign to change requests. CLECs, however, did not previously receive this information. Only when it tiled its November 1 *ex parte* did CLECs learn, for the first time, that BellSouth was making such assumptions. BellSouth previously suggested that it could not estimate its maintenance capacity needs, much less provide them to CLECs in advance of

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[23] Furthermore, it is important to remember that it IS BellSouth that provides the instructions to its vendors as to what work to perform. Poorly formed instructions from BellSouth to its vendor may well underlay the high level of defects now being found in the vendor's software. BellSouth does not allow CLECs any collaboration *or* visibility into the instructions that it provides to its vendors.

[24] Stacy Reply **Aff.** ¶ 63; November 1 *ex parte* (attachment entitled, "Prioritization of CLEC Change Requests," at 3)

implementation.[25] Similarly, until approximately **six** weeks ago, BellSouth persistently denied to the CLECs that it was reserving a "set" percentage of capacity in each release cycle capacity for scope changes in prioritized features and for "expedited features and/or mandates"

Furthermore, although the CLECs previously – and frequently -- requested that BellSouth provide a breakdown of capacity for forthcoming releases according to individual OSS components (including LEO, LESOG, LENS, EDI, and LNP), BellSouth repeatedly responded that it was unable to do so   Approximately four weeks ago, BellSouth reiterated its position in response to a request for such a breakdown by AT&T.[26] Yet, in its November 1 *exparre* and its Reply Comments, BellSouth provided *precisely* such a breakdown.[27] Amazingly, three days later, BellSouth – contradicting its own submission to the Commission – again represented to the CLECs that "this information is not available at this point of time" and "is not a fixed number."[28]

BellSouth also has not previously provided CLECs with two detailed tables included in its November 1 *ex parte* and Reply Comments. One table, entitled "Encore Suite CCP Prioritization for Release 12 and Release 13," describes how BellSouth's assignment of

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[25] For example, in the *Five-State Proceeding* BellSouth denied "that there is a set amount of capacity for each category of change requests (Types 2 through 6) by release." Stacy Reply Aff. in *Five-State Proceeding,* ¶ 3R. Although BellSouth acknowledged that "Type 6 change requests and public switched network mandates are predominantly targctcd for maintenance releases," it stated:

> Production releases, whcthcr BellSouth or CLEC, can have Types 2, 4, 5,
> and *6* change requests. In the case of Types 4 and 5 change rcquests,
> they are optional and entirely dependent upon whether it is a CLEC or
> BcllSouth production rclease In either case, during a "pre-release" point
> m timc, these rcleases are open to any and all Types 2, 4, 5, and 6 change
> requests. Listing units by category, as the CLECs' proposal would
> require BcllSouth to do, crroncously prcsumes that BellSouth knows how
> much capacity each rclease, by category of Type Change request, would
> havc before prioritization and rclcasc planning by the CLECs Although
> BellSouth could arbitrarily dcsignatc release capacity by catcgory, thcrc
> is not [sic] logical basis for doing so.

Id ¶¶ 39-40

[26] Response of BellSouth Change Management Team to Bernadette Scigler (AT&T), datcd October 18, 2002 rcsponsc to Question 2 (attached hcrcto as Attachment 6).

[27] November 1 *ex parte* (attachment cntitled "Prioritization of CLEC Change Requcsts," at 4) Stacy Rcply Aff. ¶ 64.

[28] November 4th Minutes at 5 (Attachmcnt 2 hcrcto)

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CLEC-prioritized change requests "worked for the release packaging that occurred after August 30, 2002 for the 2003 release schedule." *See* Stacy Reply Aff. ¶ 62. The table provides detailed information regarding the amount of capacity needed to implement each particular change request, the initial sizing of that request, and the reason (such as capacity constraints) why a particular change request was not included in a particular release. *Id.,* Exh. WNS-33 at 1-2. A second table, entitled "Prioritized CR to Release Map for 2003," shows the particular releases to which BellSouth has assigned each change request. *Id.* **766** & Exh. WNS-33 at **3.**

In the face of its repeated insistence to the CLECs that it could not provide this, and other, information regarding release capacity and its processes for assigning particular change requests to particular releases, BellSouth's inclusion of that very information in its submissions to the Commission this month raises serious questions regarding its candor. BellSouth's previous failure to make such information available to the CLECs conduct also belies its professed commitment to the change control process. Even now, as it provides this information in filings with the Commission, BellSouth has still not agreed to provide it directly to CLECs on a regular basis. Making this information available in public filings is no substitute for true compliance with the letter and the spirit of the CCP.

BellSouth's Failure to Implement Fully Single "C" Orders for UNE-P Conversions

Notwithstanding its commitment to this Commission, the Georgia and Louisiana Commissions, and the CLEC community, BellSouth is still causing service disruptions on partial migrations of UNE-P service as a result of its continuing use of two separate orders   BellSouth had committed to resolve this problem by the introduction of the single "C" order, but as described in the attached Supplemental Declaration of Denise Berger, BellSouth has disclosed *for the first time* in the past couple of weeks that the single "C" order has been implemented *only* for full migrations of service. AT&T and other CLECs continue to suffer competitive injury as a result of outages associated with the use of two separate orders for partial migrations. BellSouth has failed to address this problem fully, and its failure to do so is yet another indication that it is indifferent to CLEC issues and unwilling to devote the resources necessary to carry out its obligations under the Act

In the original Georgia/Louisiana proceeding, AT&T and other CLECs identified BellSouth's failure to provision UNE-P migrations correctly as the reason for significant customer outages and loss of service. Berger Supp Dec. ¶ **3.** The use of separate disconnect ("D") and new ("N") orders caused customer outages and service disruptions (including noise on the line) if the orders were not properly related or not processed in the proper order, *Id.* AT&T and other CLECs urged BellSouth to adopt the use of a single "C" order to eliminate these problems associated with the provisioning of two separate orders   *Id.* at ¶ 4. In response to CLEC complaints, the Georgia Public Service Commission and the Louisiana Public service Commission both ordered BellSouth to implement a single "C" order for UNE-P migrations to address the service problems associated with the use of separate "D" and "N" orders *Id.* at ¶ 5.

Marlene H Dortch
November 13, 2002
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BellSouth confidently predicted that the single "C" order would eliminate the problems with UNE-P migrations. In the minutes of a UNE-P Users Group meeting on December 6, 2001, BellSouth described the single "C" order as a total solution for UNE-P conversion problems:

> Single C is an effort within BellSouth to process the request to convert an account to UNE-P via the issuance of a single change order Currently, a new (N) order and a disconnect (D) order are required. Conversion scenarios will include Resale to UNE-P (same or different CLEC), Retail to **UNE-P** (BellSouth to CLEC), and UNE-P to UNE-P (CLEC to CLEC). The account types planned are residence and non-complex business This will eliminate the need for two SOCS orders and the associated coordination. There will be no change in LSR inputs or processing by CLECs. However, BellSouth's internal ordering/billing process will change. Single C will be both manual and mechanized. The targeted implementation date is second quarter of 2002.[29]

In the *Georgia/Louisiana* 27/ *Order,* the Commission stated that it was "confident that this issues is resolved' by introduction of the single "C" order and noted its expectation that "BellSouth will take the necessary steps to cure any problems associated with implementation of single 'C' ordering." *Georgia/Louisiana* 27/ *Order* at ¶ 167.

BellSouth implemented the single "C" order in Florida, Georgia, Mississippi, and Louisiana on March 24, 2002, in Alabama and South Carolina on July 21, 2002, and in North Carolina, Kentucky, and Tennessee on August 4, 2002. Berger Supp. Dec. ¶ 7 In its statements to CLECs, in its written communications with regulators, and in its statements concerning the problem, BellSouth at no time indicated that its single "C" solution was limited to full migration orders and did not also apply to partial migrations. *Id* at ¶ 8.

Notwithstanding BellSouth's commitment to implement single "C" orders to eliminate the problem with the services outages associated with UNE-P conversations, AT&T customers still lose service as a result of BellSouth's continued use of separate orders. In October, an AT&T Alabama customer migrated a portion of its service to AT&T on October 16, but as a result of BellSouth's use of separate "N" and "C" orders, lost that service on October 24 because the two orders were not properly related in BellSouth's system Berger Supp. Dec. ¶¶ 9-10

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[29] UNE-P **User** Group Meeting Minutcs 1210610I at 5 (attached as Attachment 5 to Seigler Ga/La II Supp Declaration)
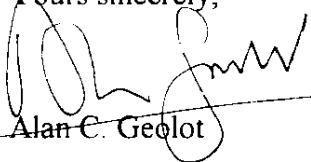
It was only as a result of this customer's loss of service that AT&T learned that BellSouth had not fully implemented the single "C" order for all UNE-P migrations, but only for full migrations BellSouth now states that the partial migration is a separate process that was never addressed by the single "C" order solution for problems associated with full migrations. Berger Supp Dec ¶¶ 12-13 This is simply incredible, as AT&T and other CLECs documented problems with a wide variety of orders in the Georgia/Louisiana proceeding. *Id.* at ¶¶ **4, 13.**

BellSouth's proposed solution is also incredible. AT&T and CLECs can submit a change request In BellSouth's view, AT&T and other CLECs can wait two years for this problem -- that the Georgia and Louisiana Commissions ordered BellSouth to resolve by the spring of 2002 -- to be fully addressed. Berger Supp Dec ¶ 14. BellSouth's conduct is yet further evidence that it will not address CLEC problems and uses the change control process to "slow roll" solutions to CLEC issues

BellSouth's Section 271 application should be denied until it shows that it will address CLEC issues and devote the necessary resources to the change control process.

Yours sincerely,

Alan C. Geolot

cc: C. Newcomb
             J Myles

ATTACHMENT 1

> From: Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com]
> Sent: Tuesday, November 12,2002 4:55 PM
> To: adsltechnician@yahoo.com; Alan.Flanigan@twtelecom.com; alee@epicus.com;
alejandro@amexcomm.com; amanda.hill@wcom.com; Annette.Cook@espire.net;
Annette.Hardy@accesscomm.com; Lynn.Arthur@BellSouth.com; asanjuan@mettel.net;
avincent@communitytelephone.com; bbil@4pra.com; bcarias@nightfire.com;
Becky.Gorman@accesscomm.com; bellsouth@nightfire.com; beverly.lockwood@btitele.com;
beverly.posey@centurytel.com; Bill.York@wcom.com; billg@telcordia.com;
bmurdo@KMCTELECOM.com; Bob.Buerrosse@allegiancetelecom.com; Bradbury,Jay M - LGA;
Brenda.Gant@KMCTELECOM.com; brian.feller@btitele.com; Seigler,Bernadette M (Bern) - NCAM;
bshafer@covad.com; BSNotes@talk.com; BSTCarrier@birch.com; bstewart@biztelone.com; c-
david.burley@wcom.com; c-Lorraine.Watson@wcom.com; c_and_m@bellsouth.net;
caren.schaffner@wcom.com; casenjo@IDSTELCOM.com; CAshford@birch.com;
cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cbrackett@mpowercom.com;
cchiavatti@usatelecominc.com; lacovelli,Christopher D (Chris) - ALINF; Cedric.Cox@wcom.com;
cflanigan@uslec.com; Chad.Pifer@xspedius.com; changecontrol.bellsouth@onepointcom.com;
CHaynes@nuvox.com; cheryl@eatel.com; cheryl_acosta@stratosoilandgas.com;
clarson@dset.com; cmiller@telepak.net; CoDavis@covad.com; colleen.e.sponseller@wcom.com;
Connie.Nathan@KMCTELECOM.com; craig.davis@centurytel.com; cschneider@concretio.com;
csmallwood@city.marietta.ga.us; CSoptic@birch.com; cstevens@mpowercom.com;
daddymax@netbci.com; daisy.ling@wcom.com; darrin.mcclary@centurytel.com; Kevin.Davis2
@BellSouth.com; DCooley@nuvox.com; Berger,Denise C - NCAM;
desiree@communitytelephone.com; dfeinberg@mettel.net; dfoust@deltacom.com;
dkane@aspiretelecom.com; dlawal@focal.com; dmitchell@mettel.net; DNapovanice@birch.com;
dnathanson@natelcomm.com; don@amexcomm.com; donaldsond@epb.net;
donna.poe@knology.com; dparobeck@mettel.net; dpetry@ix.netcom.com;
dwilliams@nowcommunications.com; egoldberg@mettel.net; Elliot.Wrann@dsl.net;
epadfield@nextlink.com; ESingleton@eztalktelephone.com; eyu@talk.com;
fouts@communitytelephone.com; frankb@cellone-ms.com; Fred.Brigham@wcom.com;
Gary@CSII.net; generalg@cris.com; ggotimer@biztelone.com; Lianne.Griffin@BellSouth.com;
Pat.Hamlin@BellSouth.com; hcarlton@sevenbridges.net; Heather.Thompson2
@allegiancetelecom.com; jake.hayes@newsouth.com; Jan.Dumas@accesscomm.com;
jason@basicphone.org; Jason.Lee@wcom.com; jboshier@covad.com; jbritton@phonesforall.com;
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1

Jeff.Walker@accesscomm.com; Jennifers@universaltelecominc.com; jerry@mclsystems.com; jerry.hill@accesscomm.com; jfury@newsouth.com; JG6837@ctmail.snet.com; jjohnson@IDSTELCOM.com; jmartin@mpowercom.com; jmclau@KMCTELECOM.com; jnugent@mettel.net; joanne.baxter@networktelephone.net; john.c.moran@wcom.com; JOliver@birch.com; JPilgrim@eftia.com; jsage@mpowercom.com; JtWilson2@att.com; Jureidini,Jordana M - NCAM; jwilwerding@birch.com; kandi.patterson@cox.com; karen.grim@mail.sprint.com; karind@covad.com; kbranch@newsouth.com; khudson@nextlink.com; KPollard@birch.com; Timmons,King C (K.C.)- NCAM; Kyle.Kopytchak@networktelephone.net; launch-now.notify@accenture.com; launch-now.notify@cscoe.accenture.com; LCamillo@nwp.com; ldav> idov@dset.com; leonb@psc.state.ga.us; LHamlin@birch.com; LHOPKINS@eftia.com; LMitchell@wisor.com; LMontele@usa.capgemini.com; lorna.richards@lecstar.com; lortega@commsouth.net; Louise.Wilds@accesscomm.com; lynnj@nowcommunications.com; rnargaret.ring@networktelephone.net; mark@annox.com; Mark.Ozanick@accesscomm.com; MaryJ.campbell@xo.com; mcbrunnhilde@juno.com; MConnolly@birch.com; mconquest@itcdeltacom.com; mdossey@biztelone.com; mer@networkwcs.com; mhillis@telcordia.com; michael.britt@lecstar.com; michael.dekorte@Lightyearcom.com; Micki.Jones@wcom.com; mnoshay@IDST> ELCOM.com; MpowerHelpdesk@mpowercom.com; msykes@telcordia.com; mt7210@momail.sbc.com; MWagner@birch.com; Nancy.Welsh@espire.net; Natalie.Franklin@KMCTELECOM.com; NDreier@birch.com; oss-accessible-letters@covad.com; pamela.a.smith@mail.sprint.com; PBarker@aol.com; Pkinghorn@eztalktelephone.com; pmckay@momentumbusiness.com; Cole,Peter M (Pete) - ALINF; PPinick@birch.com; prehm@nightfire.com; PRubino@Z-TEL.com; Quan.Nguyen@KMCTELECOM.com; Rae.Couvillion@wcom.com; rbennett@floridadigital.net; rbreckin@telcordia.com; rbuffa@interloop.net; rcostanzo@velocityky.com; Rdupraw@mpowercom.com; rebecca.baldwin@adelphia.com; regina.mcday@centurytel.com; Renee.Clark@espire.net; rharsila@commsouth.net; Rick.Whisamore@wcom.com; Rick.Williams@accesscomm.com; rmaimon@mettel.net; robert@alternativephone.com; Robert.Scordato@btitele.com; ron.p.johnson@centurytel.com; ross.martin@xo.com; rubye@arrowcom.com; RWilson@city.marietta.ga.us; Sandra.Hendricks@PaeTec.com; sandra.kahl@wcom.com; Sandrajf@intetech.com; schula.hobbs@dsl.net; SCOGBURN@newsouth.com; scott.emener@accesscomm.com; Scott.Hibbard@wcom.com; SELEAZER@talk.com; shane@eatel.com; shannon.smith@itchold.com; Sherry.Lichtenberg@wcom.com; SLively@nuvox.com; smason@interloop.net; Ramesh,Sarala - ALINF; sreynolds@ernestgroup.com; ssarem@mpowercom.com; SStapler@itcdeltacom.com; Debbie.Steen@BellSouth.com; Steve.Brown@accesscomm.com; Steve.Moore@mail.sprint.com; steve.sulak@nowcommunications.com; steve.taff@allegiancetelecom.com; susan.sherfey@btitele.com; tagteam@telexcelpartners.com; tami.m.swenson@accenture.com; taziz@epicus.com; tbarton@newsouth.com; testmis@vartec.net; tfry@commsouth.net; Tim@exceleron.com; tim.koontz@networktelephone.net; Debbie.Timmons@om1.al.bst.bls.com; Travis.Tindal@BellSouth.com; TNorvell@dcaweb.net; Todd@CSII.net; Todd_Sorice@icgcomm.com; tom.hyde@Cbeyond.net; tonyam@communitytelephone.com; Trudi.Seidl@GlobalCrossing.com; ts1336@sbc.com; TWimmerstedt@city.marietta.ga.us; Tyra.Hush@wcom.com; usfloridaoss@kpmg.com; Walter.Carnes@accesscomm.com; wendy.hernandez@comporium.com; WFletcher@birch.com; wolfsbrg@cris.com; Yvette.Brown@espire.net
> Subject: ID: 11/12/02 - Release 11.0 Status Report
>
> > <<SEND>> > > <<R11_1112.XLS>>

Attention CLECs.

Attached is the 11/12/02 Release 11.0 Status Report

Please let us know if you have questions

Thanks,

Change Management Team

_____ Distributed Message _____

This information has been distributed to you by

  Change Control /m6,mail6a

If you do not wish to receive these distributions you can unsubscribe sending a
message as follows:

    To: List Manager /m1,mail1a
  Subject: UNSUBSCRIBE CCP

CR	Horvest #	Description Feature/Defect	Open Severity 1	Code Ship to Fix	Closed from Last Report	Open Severity 2	Code Ship to Fix	Closed from Last Report	Notes
CR0040	22058 23189 25389	Order Tracking Phase 2b-CCP Prioritized-5				2			
CR0178		Provide Solicited Notifications in TAG (port of XML schema)-4							
CR0179		TAG Navigator to CORBA Bridge Router (port of XML schema)-4							
CR0228	12171, 5179. 6308	ACT of T-4				3	1 on 11/11		
CR0241	12529, 13212	CN Returned on Incorrect LSR Version for xDSL, UCL 6 EELS Phase 2-5						2	
CR0351		LSR will reject back to CLEC-6				1			
CR0461	22975	Ability To Do A Facility Check On LSRs Before The Order Is Completed (Tennessee)-2							
CR0492	6104, 9244 6302	LENS to Flow-Thru Coin LSRs-2				3	2 on 11/11	4	
CR0541	20368	Mechanization of Unbundled Copper Loop-Non Designed (UCL-ND)-excluding LNP-2				20	2 in test 2 on 11/11 8 on 11/13 1 on 11/20	4	
CR0621	23018. 21491	ECCKT Not Returned on Mechanized or Manual Loop Orders for Line share Orders-6				1			
CR0625	21094	Mech Removal of DSL with UNE-P Conversions, LNA=V-2				3			
CR0729	14850	4-Wire Digital Loops (LNP only)-2							
CR0758	21246	Mopping Error should send message to CLEC to re-submit LSR-6							
CR0779	21915	LineSharing Order Completion Sequencing Error on R&C Order-6							
CR0788	23192	LNP intermittently assigns TNs to another customer on Remote Call Forwarding-6							
CR0801	22271	ISA Time not being returned for PON List Queries for xDSL, UDC and EELS-6							
CR0842	22113	Incorrect next available due date calculated on SUP when no order existed-6							

CR	Harvest #	Description	Open Severity 1	Code Ship to Fix	Closed from Last Report	Open Severity 2	Code Ship to Fix	Closed from Last Report	Notes
CR0850	21977	xDSL ACT of T Sup's should drop for manual handling-6							
CR0871	22288	Auto-Clarify indicating that CLEC does not own the acct-6							
CR0873	22556	LENS-disconnect number on Reqtyp A may be repeated multiple times on the LSR summary-6							
CR0891	22586	LENS is not showing the RESID as populated on the LENS LSR summary-6							
CR0920	22925	Pre-Order LMU - Un-numbered House indicator is not working-6							
CR0927	22985	UCL-ND Firm Order - Defective Error Message-6							
CR0928	23018	UCL-ND Firm Order - ECCKT Not Returned on disconnect orders-6							
CR0929	21915	UCL-ND Firm Order - Completion notice not being returned on conversion orders-6							
CR0930	22972	UCL-ND Firm Order - Cancellation notice not being returned on conversion orders-6							
CR0936	23020	Facilities Check Indicator is not being processed correctly-6							
CR0937	23028	SUPSs Flowing with incorrect version-6							
CR0977	22256	PD status notifications returned after CP status is received-6							
N/A		TAG XML Transition				2	1 an 11/11		
N/A		Other			I	37	1 in test 1 on 11/11 10 on 11/13 3 on 11/15	10	

% Testing Complete: **81** 40%

NOTES: 1. "Other" represents defects that are not associated with a specific feature. Such defects could be related to environment, existing

2. Not all defects indicated above have been validated.

ATTACHMENT 2

MEETING NAME	MINUTES PREPARED BY	DATE PREPARED
Release 11.0 Status Meeting	Cheryl Storey – Change Management Team	11/5/02

Participants/Attendees

PARTICIPANT	COMPANY	PARTICIPANT	COMPANY
Peggy Rehm	Nightfire	Nicole Kisling	Birch
Valerie Cottingham	BST – CCP	Dee Freeman-Butler	BST - General Manager-Local Operations
Jill Williamson	BST – CCP	Cheryl Storey	BST - CCP
Meena Masih	BST - Release Mgmt	Dale Donaldson	Epb
Bernadette Seigler	AT&T	Kyle Kopytchak	Network Telephone
Mike Young	Telcordia	Tyra Hush	WorldCom
Tami Swenson	Accenture	Steve Hancock	BST - CCP
Mary Conquest	ITC Deltacom	Kevin McCall	BST – User Req'mts
Louis Davidov	DSET	Lucious Turner	BST – Network Svcs
Steve Taff	Allegience Telecom	Doyle Mote	BST - LCSC
Kathy Rainwater	BST - CCP	Alan Tarr	BST – LCSC
John Duffey	FL PSC	Jim Tadlock	BST - SVP
Kelly Messina	BST - Testing	Eric Paschal	BST – Testing
Travis Tindal	BST - CLEC CARE	Amanda Butler	BST – CLEC CARE
Bob Parker	BST – CLEC CARE	Janet M. Fields	BST – Customer Care
Rodney Strawter	BST – LCSC	Gary Jones	BST – Flow Through
Brenda Files	BST – CCP	Jeff Bragg	BST–TAGXML
Scot Ferguson	BST – Network Service5	Ross Martin	XO
Jordana Jureidini	AT&T	Sherry Lichtenhurp.	WorldCom
Bill Grant	Telcordia	Mel Wagner	Birch
Colette Davis	Covad	Cheryl Haynrs	Nuvox

DATE	START TIME	END TIME
11/4/02 Conf Bridge	3:00 PM ET	5:00 PM ET

MEETING MINUTES

Agenda Items	Discussion
1. Introductions/Welcome	Valerie Cottingham (BST-Change Management Team) welcomed everyone and stated that the purpose of this call was to discuss the status of Release 11.0. Valerie stated that as BellSouth has progressed through our testing cycle, it has been determined that the number of defects in the software is larger than it should be at this point in the schedule. Given this, BellSouth does not believe a December 8 implementation date can be met with acceptable quality. BellSouth has developed two options for Release 11.0 to review with the CLEC community. The two options were provided via email on 11/1/02.
1. Status of Release 11.0	Jill Williamson (BST) stated that based on where BST is in the release cycle for Release 11.0, specifically the internal test cycle, BST cannot implement a quality release on 12/7/02-12/8/02. The defect rate is higher than it should be at this point in the process; however, BST is working diligently to get the defects corrected. Jill indicated that at this point, it would not be productive to place this release into CAVE on 11/9/02. She indicated that BST has not received generally acceptable code from its vendor. Jill stated that the purpose of this meeting is to review the options for Release 11.0 and to determine the preferred option to move forward with.
	Sherry Lichtenburg (WorldCom) questioned why BST has not received generally acceptable code. Jill replied that the generally **acceptable** code from the vendor is delivered after the vendor has completed its testinp, of the code and should be with a minimal defect rate. The code received contains a much higher defect rate than previous BellSouth releases. **The** two Release 11.0 features with the most defects are: (1)UCL-ND **and** (2) UNE to UNE Bulk Migrations.
	Mary Conquest (ITC Deltacom) questioned if BST would provide a list of defects prior to CAVE. Jill replied that BST would provide a list of the defects going into CAVE. This list will be provided one week **prior** to CAVE based on the option that is selected by the CLEC community.

Agenda Items	Discussion
	Bernadette Seigler (AT&T) commented that there were 59 defects when BST went into CAVE lor the last release. Bernadette also staled that based on the FCC filing, there were currently 629 defects. Jill stated that the scope of Relrasc 11.0 is twice as large as 10.5 or 10.6 and much more complex than previous releases. Jill also commented that the **39** defects reflect the number of defects in the rodr delivered to BST by the vendor, not the number of defects BST went into CAVE with. Jill restated that BST received the initial code from the vendor and that the defect rate in this code **was** high.
	Colette Davis (Covad) questioned why the CLECs are lust now hearing this information. She also stated that CLECs are placed in a position to respond to a situation that BST and its vendors have created. Colette stated that she is very concerned and that CLECs need to count on releases being implemented when committed.
	Mrl Wagner (Birch) commented that CLECs need a better understanding of how this happened. He slated that Release 11.0 has been delayed once and that Birch submitted an appeal regarding this delay and the appeal was denied. Mel stated that Birch is not willing to push out the Release 11.0 implementation date.
	Jill stated that given the status of the release, it is not an option to implement Release 11.0 on 12/7/02-12/8/02.
	Sherry questioned why BST thinks that it will receive good code from its vendor. Jill replied that BST is working with the vendors to correct and turn around defects. BellSouth made the determination last week that the release date for 11.0 would need to be changed and began evaluating alternatives. BST filed with the FCC on Friday, **explaining** that the Release 11.0 date would not be met and why, and provided the two options that are being presented to the CLECs today.
	Kyle Kopytrhak (Network Telephone) questioned if this **is** due to a resource issue. Jill replied 'no'. Kyle questioned if **this** will affect future releases. Jill replied 'no'. Kyle also questioned how defects will be treated that are discovered by CLECs. Jill stated that defects **will** be handled via the CCP process based on severity. Kyle then questioned if BST had communicated this information to the FCC. Jill rrplied 'yes'. Kyle asked if the information commumcated to the FCC was differrnt than what was being communicated today to the CLECs. Jill replied 'no'. Kyle commented that some defects are reclassified as features and then would need to follow the pnontization process. Kyle requested that BST assist the CLECs with the validation/classification of the items that are defects in this release.

Agenda Items	Discussion
	Bernadette qurstioned what the cause of the delay is. Jill replied that the high rate of defects and the time in which BellSouth has to identify and correct the defects will not allow **us** to implement the release on December 8. Additionally, this release is more complex, specifically with the UNE-to-UNE Bulk order feature. There is no industry standard for this feature nor has it been implemented by any other ILEC. Bernadette requested that BST provide additional information as to the cause of the delay. BST agreed to provide additional dormation.
3. Release 11.0 - Options 1 & 2	Jill presented the two options for Release 11.0:
	Option 1:
	• 12/29/02 Implementation Date
	• 11/25/02 - 12/27/02 CAVE
	• UNE to UNE Bulk Migrations would **bo** deferred
	• 1/19/02 - Release 11.1 (defects and XML via Internet)
	• 3/30/03 - Release 12.0 (add UNE to UNE Bulk Migrations)
	• Releases 12.0, 13.0 and 14.0 keep current schedule and scope
	Option 2:
	• 1/19/03 Implementation Date - Releases 11.0 and 11.1 combined (keeps content of Release 11.0 whole and includes Internet option for XML)
	• 12/9/02 - 1/17/03 CAVE
	• Releases 12.0, 13.0 and 14.0 keep current schedule and scope
	CLECs questioned what confidence BST has that the implementation dates for the two options will not change. Jill replied that BST has confidence that the implementation dates in the two options will be met based on the steps BST is taking and the rate for clearing defects.
	Sherry qurstioned what is the acceptable number of defects that BST would go into CAVE with **for** a release. Jill replied that no severity 1 or 2s would go into CAVE.
	Tami Swenson (Accenture) questioned that if Option 1 is chosen, would resources be available to test during the Holiday season. Jill replied that resources will be available to do CAVE testing with CLECs if Option 1 is selected.